



United States Department of the Interior
NATIONAL PARK SERVICE
BRYCE CANYON NATIONAL PARK
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L2427 (1330)

November 18, 2009

To: Howard Strand, Office of Surface Mining
From: Eddie Lopez, Superintendent, Bryce Canyon National Park
Subject: Suggestions for the Evaluation of the Utah Coal Regulatory Program

Thank you for the opportunity to provide feedback on the evaluation process for the Utah Division of Oil, Gas and Mining (DOGM). We are pleased to have this opportunity to communicate ongoing resource protection concerns as identified by our park as well as park units in southern Utah.

As directed by the Organic Act (16 USC 1 et seq. Organic Act), Redwoods National Park Act (16 USC 79a-79q), and National Park Service Policy (2006), national parks are responsible for responding to any proposals and changes to adjacent lands that may impact the park's resources such as but not limited to air pollution, water pollution, and the loss of scenic vistas, natural quiet, and wildlife habitat. With the possibility of increased levels of mining activity that may occur in our region, especially related to future activity associated with the Coal Hollow project, it is imperative that potential impacts be examined and minimized to the maximum extent practicable so that energy development can be conducted in a manner that ensures the protection of adjacent public lands.

Bryce Canyon National Park was established, in part, for its "unusual scenic beauty," and the authorities establishing and enlarging the park explicitly mandate the preservation of these scenic resources. The park receives approximately 1.5 million visitors annually, who come to enjoy the outstanding visual, recreational, and resource values that may be compromised from resource extraction activities on adjacent lands. Bryce Canyon National Park is the main visitor attraction to Garfield County, where tourism represents 60% of the economic base. As such, visitor expenditures contribute substantially to employment and economic activity of Garfield County. We believe that activities such as oil and gas leasing and mining exploration and extraction in the region of the park could adversely impact the park's recreation and tourism attractiveness, and thus, the economy of the area. Several issues have been identified as concerns related to oil and gas leasing and mining activities adjacent to, or within the vicinity of the park. A primary concern that could affect the resources at Bryce Canyon (as well as other park units) is the protection of air quality.

The National Park Service is concerned about the potential impacts to air quality and Air Quality Related Values (AQRV) that could occur in nearby National Parks as a result of oil and gas extraction and mining activities. The potential for mining development in vicinity of Bryce Canyon is of particular concern due to our status as a Class I area, related to visibility, which could be significantly affected by air pollution. AQRV effects related to mining activities within close proximity to any Class I or Class II areas should be specifically evaluated for large scale mining activities.

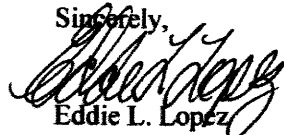
Other concerns related to oil, gas and mining leases adjacent to the park and within the region include the spread of invasive species, boundary protection, scenic values, night skies and natural soundscape protection, and watershed protection. Many factors (light pollution, dust, noise, additional roads) singly may not

significantly degrade the natural environment or visitor's experience at Bryce Canyon National Park but cumulatively could result in long-term resource deterioration and reduced visitor enjoyment.

The importance to Bryce Canyon National Park of the area in which potential oil and gas leasing and mining activities may occur was noted in a 1980 "Secretary's Decision" (OSM Ref. No. 79-5-001). This decision designated as unsuitable for surface coal mining much of the same area which is now proposed for oil and gas operations—to protect the values and resources of Bryce Canyon National Park. Many of the same factors that make this area unsuitable for surface coal mining also make the area unsuitable for oil and gas exploration and extraction. Also relevant is Item 6 of this decision, which states, "*Under no circumstances should this decision become the only basis for protection of the values for which Bryce Canyon National Park was established and I direct that these park values be taken into account in future decisions by the bureaus of this Department on mining plans, permit applications or other activities on undesignated Federal lands near the Park...*".

We appreciate the Office of Surface Mining's consideration of our concerns as you are evaluating the effectiveness of DOGM to minimize offsite impacts to resources adjacent to permitted mining operations. If you have any questions regarding our comments, please contact Laura Schrage, Acting Chief of Resources Stewardship & Science Division, at 435-834-4751 or laura_schrage@nps.gov.

Sincerely,



Eddie L. Lopez
Superintendent, Bryce Canyon National Park

cc:

Andrea Stacy, Air Resources Division, NPS
Paul Roelandt, Superintendent, Cedar Breaks National Monument
Superintendent, Zion National Park
Superintendent, Capitol Reef National Park
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